Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In Re: Delete Delete Delete	)	GN Docket 25-133
	)	
	)	DA 25-219

COMMENTS OF
RELEVANT RADIO, INC.

I. INTRODUCTION AND BACKGROUND

Relevant Radio, Inc. ("Relevant Radio"), a Wisconsin not-for-profit corporation, is the licensee of approximately 80 full-power AM and FM stations, all of which operate on a noncommercial educational ("NCE") basis. Relevant Radio also is the licensee of an additional 50+ FM translator stations nationwide and furthermore provides programming to dozens of full-power and low power broadcast affiliates across the U.S. By these Comments, Relevant Radio urges the Commission to amend Section 74.1231(b) of its rules, 47 C.F.R. §74.1231(b), to eliminate the over-the-air ("OTA") reception requirement for FM translators operating in the unreserved portion of the FM band that rebroadcast co-owned NCE stations. This change would modernize the Commission's regulatory framework, enhance operational flexibility for radio stations, and better serve the public interest by ensuring reliable delivery of NCE programming.

Relevant Radio is a Catholic-inspired service, and has been broadcasting 24 hours a day, 7 days a week, and 365 days a year since 1999 with award-winning hosts and original educational programming. Relevant Radio's programs educate listeners about many aspects of the Catholic faith, and lead them to a deeper understanding of that faith, with the goal of assisting listeners in applying that faith to their day-to-day lives.

Relevant Radio's programs include "Father Simon Says," airing six days per week, which includes a thorough examination of the daily Scripture readings, helping listeners make a

connection between the Old and New Testaments and develop a better appreciation of the teachings of the Bible, and "The Patrick Madrid Show," which is a source for the latest in current events and contemporary issues. Numerous other programs air on Relevant Radio during the broadcast day, which give listeners tools to experience spiritual growth, discuss topics of interest to today's families and include interviews with newsmakers, elected officials, scholars, notable experts and clergy.

Like other radio and television networks, both religious and secular, Relevant Radio produces the vast majority of its programming, including the programs described above, from a centralized location. In Relevant Radio's case, the programming originates from either its primary studio facilities located in Lincolnshire, Illinois or its secondary studio located in Green Bay, Wisconsin. The programs then are transmitted via satellite or Internet to the local transmitter sites for each of Relevant Radio's nearly 80 AM and FM stations – most of which operate from locations that are leased to Relevant Radio, rather than owned real property sites – and then broadcast to local listening audiences.

In short, Relevant Radio is an experienced radio operator with a deep understanding of the broadcasting industry and how the Commission's regulations have a profound effect on the manner in which radio stations operate. Relevant Radio commends the Commission for "seeking public input on identifying FCC rules for the purpose of alleviating unnecessary regulatory burdens [and seeking] comment on deregulatory initiatives that would facilitate and encourage American firms' investment in modernizing their networks, developing infrastructure, and offering innovative and advanced capabilities."[1] As discussed below, Relevant Radio has identified a simple phrase that

[1] *In re: Delete Delete Delete*, Public Notice, GN Docket 25-133, DA 25-219 (rel. Mar. 12, 2025), at 1.

– if delete, delete, deleted – would significantly improve not only the financial well-being of Relevant Radio and every other NCE operator in the country (again, both religious and secular), but also would result in vastly improved radio service to millions of listeners.

II. DELETION OF RULE REQUIRING NON-COMMERCIAL ENTITIES TO DELIVER PROGRAMMING TO CERTAIN FM TRANSLATORS EXCLUSIVELY OVER-THE-AIR.

Section 74.1231(b) of the Commission's rules is set forth as follows:

> An FM translator may be used for the purpose of retransmitting the signals of a primary AM or FM radio broadcast station or another translator station the signal of which is received directly through space, converted, and suitably amplified, and originating programming to the extent authorized in paragraphs (f), (g), and (h) of this section. However, an FM translator providing fill-in service may use any terrestrial facilities to receive the signal that is being rebroadcast. An FM booster station or a noncommercial educational FM translator station that is operating on a reserved channel (Channels 201-220) and is owned and operated by the licensee of the primary noncommercial educational station it rebroadcasts may use alternative signal delivery means, including, but not limited to, satellite and terrestrial microwave facilities. Provided, however, that an applicant for a noncommercial educational translator operating on a reserved channel (Channel 201-220) and owned and operated by the licensee of the primary noncommercial educational AM or FM station it rebroadcasts complies with either paragraph (b)(1) or (b)(2) of this section:

Relevant Radio proposes deletion of the phrase highlighted above ("operating on a reserved channel (Channels 201-220) and is"), to allow each NCE AM and FM station to deliver programming to its co-owned NCE FM booster or FM translator station by **any means**, including satellite, Internet, terrestrial, or OTA. While the requirement for NCE FM translators operating in the unreserved band to receive the signal of their primary station OTA may have been practical in an earlier era of broadcasting, today it imposes unnecessary technical and economic burdens on NCE stations such as Relevant Radio. Indeed, this simple deletion will allow not only for significant cost savings, but also would guarantee improved aural service to all listeners within the service area of each NCE FM booster or FM translator station across the country.

At present, and consistent with Section 74.1231(b), Relevant Radio owns and operates numerous FM translator stations that rebroadcast its NCE AM or FM radio stations. Relevant Radio's NCE FM translators are in both the reserved (88.1 to 91.9 MHz) and the unreserved (92.1 to 107.9 MHz) portions of the FM band, but the vast majority of its NCE FM translators are in the unreserved portion of the band. Section 74.1232(d) of the Commission's rules, 47 C.F.R. § 74.1232(d), prohibits the coverage contour for an FM translator rebroadcasting a commercial AM or FM station to extend beyond that of the FM translator's primary station. These are known as "fill in translators." However, there is no requirement that an FM translator rebroadcasting a NCE AM or FM station maintain a coverage contour within that of the FM translator's primary station. These are known as "non-fill in translators." Due to the obligations of Section 74.1231(b), FM translators operating in the commercial portion of the FM band that are rebroadcasting NCE AM and FM stations must receive the signals of its primary station only via OTA.

Relevant Radio proposes that it be permitted to designate a single NCE AM or FM station as the "primary" station for all of its FM translators nationwide, no matter where in the FM band those FM translators operate. In so doing, Relevant Radio would be able to cease maintaining duplicate leases, equipment, insurance, utilities, music licensing fees and property taxes for many full-service AM and FM properties. Indeed, Relevant Radio estimates that its cost savings could be upwards of $600,000 per year – funds which could be dedicated instead towards improvements in programming and related matters.

To best illustrate why making the straightforward change would have such a significant impact, Relevant Radio offers the example of how it operates a primary NCE FM station and several NCE FM translator stations in New Mexico.

Relevant Radio is the licensee of NCE FM station KXXQ, Milan, New Mexico, which operates with 100 kW effective radiated power, utilizing a multi-bay non-directional antenna situated on top of a mountain. Relevant Radio also owns and operates four FM translator stations in the reserved band that rebroadcast KXXQ, all of which are located to the east of KXXQ's transmitter site: K202EF, licensed to Tucumcari (about 250 miles east of Milan); K203ES, licensed to Roswell (about 275 miles southeast of Milan); K204DB, licensed to Portales (about 300 miles east of Milan); and K219DR, licensed to Clovis (also about 300 miles east of Milan) (collectively, the "Four Reserved Band Translators"). Due to intervening mountainous terrain, the OTA signal of KXXQ is unable to reach any of the Four Reserved Band Translators' transmitter sites. As a result, pursuant to Section 74.1231(b) of the Commission's rules, Relevant Radio is permitted to deliver its programming directly to the Four Reserved Band Translators using "alternative signal delivery means."

Relevant Radio also owns and operates two FM translators in the unreserved portion of the band (also rebroadcasting KXXQ), both of which are located to the west of KXXQ's transmitter site: K237EQ, licensed to Farmington and K283AQ, licensed to El Dorado (collectively, the "Two Unreserved Band Translators"). Although the Two Unreserved Band Translators' transmitter sites are also located a significant distance from KXXQ's site, both translators are able to receive the OTA signal originating from KXXQ. However, pursuant to Section 74.1231(b) of the Commission's rules, the Two Unreserved Band Translators are permitted to operate only when they can receive KXXQ's OTA signal.

Stated another way, the only difference between the Four Reserved Band Translators and the Two Unreserved Band Translators is their location in the FM band. Collectively, all six translators rebroadcast the same FM station (KXXQ). And KXXQ, in turn, provides the same

programming as the programming that Relevant Radio provides to its other 130+ full power and FM translators nationwide. But because the Two Unreserved Band Translators are located above 91.9 MHz, Relevant Radio must erect and maintain different types of facilities – one transmit and receive system for the Four Reserved Band Translators and a separate transmit and receive system for the Two Unreserved Band Translators. The need to preserve separate mechanisms is an anachronism in today's broadcast world.

Typically, Relevant Radio delivers its programming to its primary AM and FM stations (and to the Four Reserved Band Translators) via satellite, which Relevant Radio has found is preferable over Internet.[2] But it has also found that delivering programming utilizing either alternative is superior to delivering its signal exclusively via broadcast for several reasons. First, the primary AM or FM station's OTA signal is susceptible to interference, terrain challenges, and atmospheric conditions. Indeed, in New Mexico, many FM stations (including KXXQ) suffer interference from co-channel or adjacent-channel FM stations due to tropospheric ducting, a phenomenon common to FM stations in Summer months, which results in FM signals traveling for greater distances than anticipated, thereby causing interference. Second, the FM translator antennas that must be mounted on towers or rooftops in order to receive the primary stations' OTA signals (such as the equipment associated with the Two Unreserved Band Translators) tend to be large and bulky. In windstorms (common in New Mexico), these antennas can shift, even ever-so-slightly, causing problems in receiving the FM signals.

[2] In Relevant Radio's experience, there tend to be fewer issues receiving a signal at a local station's transmitter site when using satellite downlink facilities. However, Relevant Radio's satellite facilities use large, C-Band dishes that are approximately 12 feet long, and some of Relevant Radio's tower site landlords will either not permit the installation of such dishes or charge higher rent to Relevant Radio for including them. As a result, in some cases, Relevant Radio utilizes exclusively Internet to deliver its programming from its studios to the local stations.

When Relevant Radio delivers its programming to the Four Reserved Band Translators via satellite, there are almost zero problems. That is, the signal is extremely reliable, and Relevant Radio's listeners have not lodged any complaints about interference or reception issues with respect to the Four Reserved Band Translators. The same cannot be said for the Two Unreserved Band Translators. In Relevant Radio's experience, it has had to spend thousands of dollars – and significant time and labor from its employees – simply to maintain the Two Unreserved Band Translators.

Relevant Radio would be better able to serve its listeners if it did not have to invest in either: (a) costly equipment or infrastructure at its FM translator or full-power sites, or (b) leases, insurance, utilities, music licensing fees and property taxes at its full-power AM and FM properties, as such investment is required only to maintain rule-compliant signal reception. Indeed, in order to comply with Section 74.1231(b), Relevant Radio has had to divert funds from programming and community service. Deleting just a few words from Section 74.1231(b) would reduce financial strain and enable reinvestment in Relevant Radio's mission-driven content.

III. CONCLUSION

In the end, allowing FM translators rebroadcasting NCE stations to use alternative delivery methods without restriction aligns the rules with current technological realities. Deleting just a few words from Section 74.1231(b) to allow NCE licensees to deliver signals via any means, including satellite and Internet, to their FM translators operating in the unreserved portion of the FM band, would empower NCE licensees such as Relevant Radio to deliver high-quality educational and community programming more effectively. It would reduce operational barriers, enhance signal reliability, and free resources for content creation, all of which advance the Commission's goals of promoting diversity, localism, and access to information.

Respectfully submitted,

RELEVANT RADIO, INC.

By:_____/s/_____
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